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Attorneys for Defendant,  
CAPITAL ONE BANK (USA), N.A.,  
Named as "Capital One, N.A."

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ELEANOR MUNROE, an individual,

**Plaintiff,**

V.

CAPITAL ONE, N.A.; EARLY  
WARNING SERVICES, LLC; JP  
MORGAN CHASE BANK, N.A.; AND  
LEXISNEXIS RISK SOLUTIONS, INC.

## Defendants.

Case No. 2:20-cv-00707-GMN-DJA

*Assigned to Chief Judge Gloria A.  
Navarro; Referred to Magistrate  
Daniel J. Albregts*

**STIPULATION AND  
[PROPOSED] ORDER TO  
EXTEND TIME TO RESPOND  
TO COMPLAINT**

**(SECOND REQUEST)**

Complaint Filed: April 21, 2020

Plaintiff Eleanor Munroe (“Plaintiff”), by and through her counsel of record, and Defendant Capital One Bank (USA), N.A., named as “Capital One, N.A” (“Capital One”), by and through its counsel of record (collectively, the “Parties”), hereby submit this stipulation to extend Capital One’s time to file a responsive pleading to Plaintiff’s Complaint by fourteen (14) days, as follows:

**WHEREAS:**

1. Plaintiff filed the Complaint in this matter on April 21, 2020;
  2. The Parties agree that a further brief extension of time for Capital One to file its responsive pleading to the Complaint would benefit both Parties because it will allow them to continue to gather additional facts and information while continuing to devote their resources to exploring the potential for early resolution of this matter before incurring further fees and costs;
  3. The Parties agree this request is made in good faith and not for the purposes of delay;
  4. Capital One and Plaintiff have agreed to extend Capital One's deadline to respond to Plaintiff's Complaint to June 22, 2020.

**NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

Capital One will file its responsive pleading to Plaintiff's Complaint on or before June 22, 2020.

## IT IS SO STIPULATED.

DATED: June 4, 2020

## KNEPPER & CLARK LLC

By: /s/ Miles N. Clark  
MILES N. CLARK  
MATTHEW I. KNEPPER  
Attorneys for Plaintiff,  
ELEANOR MUNROE

DATED: June 4, 2020

**FERNALD LAW GROUP LLP**

By:   
/s/  
BRANDON C. FERNALD  
Attorneys for Defendant,  
CAPITAL ONE BANK (USA), N.A.

**IT IS SO ORDERED:**

DATED: June 8, 2020

  
Daniel J. Albregts  
United States Magistrate Judge

**FERNALD LAW GROUP LLP**  
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Attorneys for Defendant  
CAPITAL ONE BANK (USA), N.A.,  
Named as "Capital One, N.A."

**UNITED STATES DISTRICT COURT**

**DISCTRRICT OF NEVADA**

**CERTIFICATE OF SERVICE**

I, Brandon C. Fernald, declare that I am over the age of eighteen years and not a party to this action. I am employed in Clark County, and my business address is: Fernald Law Group LLP, 6236 Laredo Street, Las Vegas, Nevada 89146.

On June 5, 2020, I hereby certify that a true and complete copy of the foregoing documents:

## **1. STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT (SECOND REQUEST)**

have been served by forwarding said copy on this the 5th day of June 2020 by transmitting via the Court's ECF system the documents listed above to:

<p><b>Matthew I. Knepper</b>  <b>Miles N. Clark</b>  Knepper &amp; Clark LLC  5510 So. Fort Apache Rd., Ste. 30  Las Vegas, NV 89148  Tel: (702) 856-7430  Fax: (702) 447-8048  Email: <a href="mailto:matthew.knepper@knepperclark.com">matthew.knepper@knepperclark.com</a>  <a href="mailto:miles.clark@knepperclark.com">miles.clark@knepperclark.com</a></p> <p><b>Attorneys for Plaintiff Eleanor Munroe</b></p>	<p><b>David H. Krieger</b>  Krieger Law Group, LLC  2850 W. Horizon Ridge Blvd., Ste. 200  Henderson, NV 89052  Tel: (702) 848-3855  Email: <a href="mailto:dkrieger@kriegerlawgroup.com">dkrieger@kriegerlawgroup.com</a></p> <p><b>Attorneys for Plaintiff</b>  <b>Eleanor Munroe</b></p>
<p><b>Gary E. Schnitzer</b>  Kravitz, Schnitzer &amp; Johnson, Chtd.  8985 S. Eastern Ave., S.te 200  Las Vegas, NV 89123  Tel: (702) 222-4142  Fax: (702) 362-2203  Email: <a href="mailto:gschnitzer@ksjattorneys.com">gschnitzer@ksjattorneys.com</a></p> <p><b>Attorneys for Defendant</b>  <b>LexisNexis Risk Solutions, Inc.</b></p>	<p><b>Meagan Mihalko</b>  Troutman Sanders  1001 Haxall Point Ste 1500  Richmond, VA 23219  Tel: (804) 697-1281</p> <p><b>Attorneys for Defendant</b>  <b>Early Warning Services, LLC</b></p>
<p>Joel Edward Tasca  Ballard Sphar LLP  1980 Festival Plaza Drive  Suite 900  Las Vegas, NV 89135  Tel: (702)-471-7000  Fax: (702) 471-7070  Email : <a href="mailto:tasca@ballardspahr.com">tasca@ballardspahr.com</a></p> <p><b>Attorneys for Defendant</b>  <b>JP Morgan Chase Bank, NA</b></p>	<p><b>(SERVICE BY FIRST CLASS USPS)</b></p>

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED: June 5, 2020

RLCB

Brandon C. Fernald